

State of Missouri)
)ss
County of Jackson)

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2003 SEP 15 P 1:57

**Federal Election Commission
999 E Street, N.W.,
Washington, D.C. 20463.**

MUR # 6072

David Browning

Oak Grove, Mo 64075
Complainant.

v.

NORTHLAND REGIONAL
CHAMBER of COMMERCE
634 NW Englewood Road,
Kansas City, MO 64118

Respondent

**COMPLAINT FOR VIOLATION OF COMMISSION DEBATE
RULES**

Comes now the Complainant herein and for his complaint states:

1. That Complainant is David R. Browning, _____
_____, Oak Grove, Missouri and a candidate for the United States
Congress Seat for the 6th District of Missouri.
2. That the respondent is the Northland Regional Chamber of
Commerce, 634 NW Englewood Road, Kansas City Mo 64118, a
Missouri Not For Profit Corporation.
3. That the registered agent and president of the aforesaid
corporation is Shella Tracy, 634 NW Englewood Road, Kansas City

29044241033

Missouri 64118.

4. That the aforesaid corporation plans to and will violate the rules of the commission by holding a debate designed to promote some candidates over others, 11 CFR 110.13(b).

5. That the aforesaid corporation plans to and will violate the rules of the commission by holding a debate wherein the candidates were not chosen by preexisting , pre-established criteria. 11 CFR 110.13 (c).

6. That the complainant believes on information and belief , being advised by the attached written statements made to him by corporate officers, that there were no pre-established criteria for determining debate participants, and that two directors of the corporation sat down and decided the candidates to whom debate slots would be offered after the beginning of the election cycle.

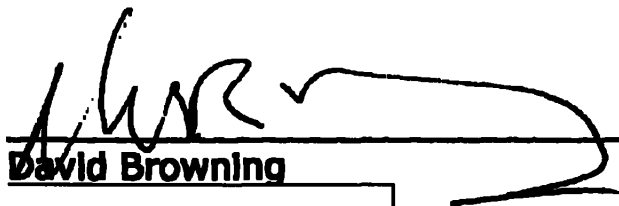
7. That the criteria used violate the debate rules of the election commission that prohibit using the nomination of a candidate by a particular party as the criteria for choosing debate participants. 11 CFR 110.13(c).

8. That complainant asked that the decision be reconsidered and has been told that it will not be reconsidered.

8. That complainant is a candidate for a long established political party in Missouri with full ballot access and is being excluded from the debate on 21 October 2008.

9. That the debate 21 October 2008 is only one of three being conducted during this election, and that complainant has filed a tandem complaint relating to one other debate scheduled for 3 October 2008, and is awaiting a response to determine if he must file a complaint and a state law injunction on the third debate scheduled 16 October 2008.

Complainant requests the immediate intervention of the commission to declare the debate in violation of the rules of the commission, that the Northland Regional Chamber of Commerce be fined an amount deemed reasonable to deter such action in the future, that the complainant be included in the aforesaid debates, and for other relief as the commission deems proper upon a full investigation of the facts.


David Browning

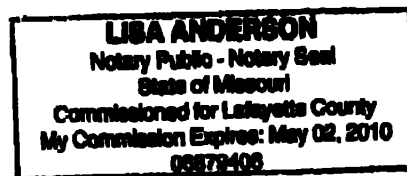
Oak Grove Missouri 64075
Candidate for United States
Congress

daveb@davesfriends.org

Subscribed and Sworn to before me a Notary Public in and for
said County and State on // September 2008.


Notary

My Commission Expires: 5-2-2010



29044241035

State of Missouri)
)ss
County of Jackson)

**Federal Election Commission
999 E Street, N.W.,
Washington, D.C. 20463.**

David Browning

Oak Grove, Mo 64075
Complainant.

v.

NPG Newspapers Inc
825 Edmond Street
Saint Joseph, MO 64501

Respondent

**COMPLAINT FOR VIOLATION OF COMMISSION DEBATE
RULES**

Comes now the Complainant herein and for his complaint states:

1. That Complainant is David R. Browning, _____
_____, Oak Grove, Missouri and a candidate for the United States
Congress Seat for the 6th District of Missouri.
2. That the respondent is NPG Newspapers Inc., 825 Edmond
Street, Saint Joseph, MO 64501, a Missouri Corporation.
3. That the registered agent of the aforesaid corporation is Lyle
E. Leimkuhler, 825 Edmond Street, Saint Joseph, MO 64501,
4. That the aforesaid corporation plans to and will violate the

29044241036

rules of the commission by holding a debate designed to promote some candidates over others, 11 CFR 110.13(b).

5. That the aforesaid corporation plans to and will violate the rules of the commission by holding a debate wherein the candidates were not chosen by preexisting , pre-established criteria. 11 CFR 110.13 (c).

6. That the complainant believes on information and belief , being advised oral statements made to him, that there were no pre-established criteria for determining debate participants, and that it was decided to exclude the complainant because his participation would detract from the message of the other candidates, and that the aforesaid determination is memorialized in written memo, and that the decision as to which the candidates to whom debate slots would be offered was made after the beginning of the election cycle.

7. That the criteria used violate the debate rules of the election commission that prohibit using subjective criteria for choosing debate participants. 11 CFR 110.13(c).

8. That complainant asked that the decision be reconsidered and has been told that it will not be reconsidered.

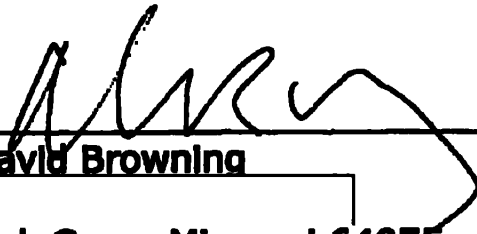
9. That complainant is a candidate for a long established political party in Missouri with full ballot access and is being excluded from the debate on 16 October 2008.

10. That the debate 16 October 2008 is only one of three being conducted during this election, and that complainant has filed a tandem complaints relating to one other debate scheduled for 3 October 2008, and 21 October 2008.

Complainant requests the immediate intervention of the commission to declare the debate in violation of the rules of the commission, that the NPG Newspapers be fined an amount deemed reasonable to deter such action in the future, that the

29044241037

complainant be included in the aforesaid debates, and for other relief as the commission deems proper upon a full investigation of the facts.



David Browning

Oak Grove Missouri 64075
Candidate for United States
Congress

daveb@davesfriends.org

Subscribed and Sworn to before me a Notary Public In and for
said County and State on // September 2008.



Notary

My Commission Expires: 5-2-2010



29044241038

State of Missouri)
)ss
County of Jackson)

**Federal Election Commission
999 E Street, N.W.,
Washington, D.C. 20463.**

David Browning

Oak Grove, Mo 64075
Complainant.

v.

Missouri Western State University
4525 Downs Drive
Saint Joseph, MO 64507
Respondent

**COMPLAINT FOR VIOLATION OF COMMISSION DEBATE
RULES**

Comes now the Complainant herein and for his complaint states:

1. That Complainant is David R. Browning, _____
_____, Oak Grove, Missouri and a candidate for the United States
Congress Seat for the 6th District of Missouri.
2. That the respondent is Missouri Western State University
4525 Downs Drive, Saint Joseph, MO 64507 .
3. That the aforesaid corporation plans to and will violate the
rules of the commission by holding a debate designed to promote
some candidates over others, 11 CFR 110.13(b).

29044241039

4. That the aforesaid corporation plans to and will violate the rules of the commission by holding a debate wherein the candidates were not chosen by preexisting , pre-established criteria. 11 CFR 110.13 (c).

5. That the complainant believes on information and belief , being advised oral statements made to him, that there were no pre-established criteria for determining debate participants, and that it was decided to exclude the complainant because his participation would detract from the message of the other candidates, and that the aforesaid determination is memorialized in written memo, and that the decision as to which the candidates to whom debate slots would be offered was made after the beginning of the election cycle.

6. That the criteria used violate the debate rules of the election commission that prohibit using subjective criteria for choosing debate participants. 11 CFR 110.13(c).

7. That complainant asked that the decision be reconsidered and has been told that it will not be reconsidered.

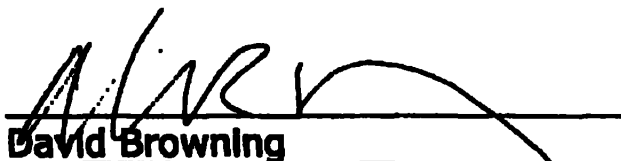
8. That complainant is a candidate for a long established political party in Missouri with full ballot access and is being excluded from the debate on 16 October 2008.

9. That the debate 16 October 2008 is only one of three being conducted during this election, and that complainant has filed a tandem complaints relating to one other debate scheduled for 3 October 2008, and 21 October 2008.

10. That the event is not exempted under 11 CFR 110.12(a) as it is not in the normal course of university operations.

11. That the event is not exempted under 11 CFR 110.12(b)1 as it is not in an academic setting in the normal course of university operations.

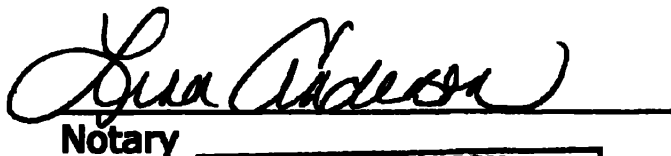
Complainant requests the immediate intervention of the commission to declare the debate in violation of the rules of the commission, that the Missouri Western State University be fined an amount deemed reasonable to deter such action in the future, that the complainant be included in the aforesaid debates, and for other relief as the commission deems proper upon a full investigation of the facts.


David Browning

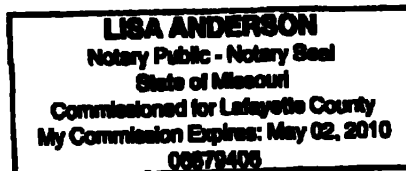
Oak Grove Missouri 64075
Candidate for United States
Congress

daveb@davesfriends.org

Subscribed and Sworn to before me a Notary Public in and for
said County and State on // September 2008.


Notary

My Commission Expires: 5-2-2010



29044241041

State of Missouri)
)ss
County of Jackson)

**Federal Election Commission
999 E Street, N.W.,
Washington, D.C. 20463.**

David Browning

Oak Grove, Mo 64075
Complainant.

v.

The Saint Joseph Area
Chamber of Commerce
a Missouri Not-for-Profit Corporation
3003 Fredrick Avenue,
Saint Joseph, Missouri.
Respondent

**COMPLAINT FOR VIOLATION OF COMMISSION DEBATE
RULES**

Comes now the Complainant herein and for his complaint states:

1. That Complainant is David R. Browning, _____
_____, Oak Grove, Missouri and a candidate for the United States
Congress Seat for the 6th District of Missouri.
2. That the respondent is the Saint Joseph Area Chamber of
Commerce, a Missouri Not For Profit Corporation.
3. That the registered agent and president of the aforesaid
corporation is Ted Allison, 3003 Fredrick Avenue, Saint Joseph,

29044241042

Missouri.

4. That the aforesaid corporation plans to and will violate the rules of the commission by holding a debate designed to promote some candidates over others in violation of 11 CFR 110.13(b).

5. That the aforesaid corporation plans to and will violate the rules of the commission by holding a debate wherein the candidates were not chosen by preexisting , pre-established criteria in violation of 11 CFR 110.13(c).

6. That the complainant believes on information and belief , being advised by the oral statements made to him by corporate officers, that there were no pre-established criteria for determining debate participants, and that the president of the corporation sat down with another director and decided the candidates to whom debate slots would be offered after the beginning of the election cycle.

7. That the complainant has attempted to discuss these matters with the president of the corporation and has received no response.

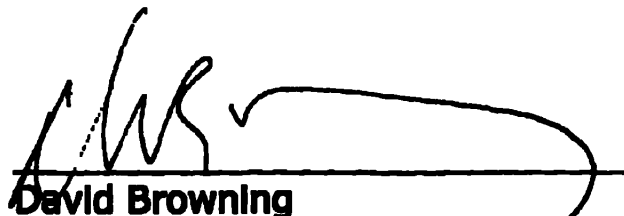
8. That complainant is a candidate for a long established political party in Missouri with full ballot access and is being excluded from the debate on 3 October 2008.

9. That the debate 3 October 2008 is only one of three being conducted during this election, and that complainant has filed a tandem complaint relating to one other debate scheduled for 21 October 2008, and is awaiting a response to determine if he must file a complaint and a state law injunction on the third debate scheduled 16 October 2008.

Complainant requests the immediate intervention of the commission to declare the debate in violation of the rules of the commission, that the Saint Joseph Area Chamber of Commerce be fined an amount deemed reasonable to deter such action in the future, that the complainant be included in the aforesaid

29044241043

debates, and for other relief as the commission deems proper upon a full investigation of the facts.


David Browning

Oak Grove Missouri 64075
Candidate for United States
Congress

daveb@davesfriends.org

Subscribed and Sworn to before me a Notary Public in and for
said County and State on // September 2008.


Notary

My Commission Expires: 5-2-2010



29044241044